

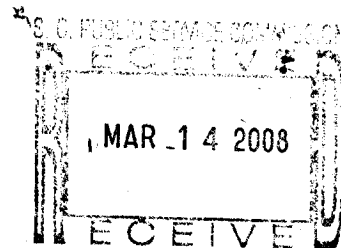
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ROBERT GUILD

Attorney at Law

314 Pall Mall • Columbia, South Carolina 29201 • 803-252-1419

March 13, 2008



Mr. Charles Terreni
Chief Clerk
Public Service Commission of South Carolina
Synergy business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

Re: Application of Duke Energy Carolinas, LLC for Approval of Decision to Incur
Nuclear Generation Pre-Construction Costs
Docket No. 2007-440-E

Dear Mr. Terreni:

Enclosed please find for filing and consideration **INTERROGATORIES, REQUESTS FOR PRODUCTION AND REQUEST FOR ENTRY BY FRIENDS OF THE EARTH**, which I am serving today upon Duke Energy Carolinas, LLC, by its Attorney Frank R. Ellerbe, III.

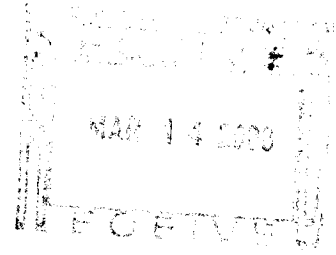
With kind regards I am

Sincerely

Robert Guild

Encls

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2007-440-E



In the Matter of)	
)	
Application of Duke Energy Carolinas, LLC)	INTERROGATORIES, REQUESTS
for Approval of Decision to Incur Nuclear)	FOR PRODUCTION AND REQUEST
Generation Pre-Construction Costs)	FOR ENTRY BY FRIENDS OF THE
)	EARTH

To: Duke Energy Carolinas, LLC , by its
Attorney Frank R. Ellerbe, III

Pursuant to R. 103-833 of the Commission's Rules and Rules 33 and 34 of the South Carolina Rules of Civil Procedure, Friends of the Earth ("FoE"), hereby propounds the following interrogatories and request that Duke Energy Carolinas, LLC (hereafter, "Duke") produce and permit FoE to inspect and copy each of the documents described below within 20 days at the offices of the Duke' s counsel, or at such other place as may be mutually agreed upon by counsel.

FoE further requests that they and their agents be permitted entry at times and dates to be mutually agreed upon by counsel within 20 days upon the lands and premises which are the location of the subject plant for purposes of inspection, measuring, surveying, photographing, testing, or sampling.

DEFINITIONS AND INSTRUCTIONS

A. The term "document" means and includes, but is not limited to, letters, memoranda, notes, studies, minutes of meetings, drawings, photographs, plats, deeds,

maps, publications, calender notations, diaries, contracts, receipts, computer E-mails and other computerized records, messages, telephone logs, canceled checks, itineraries, agreements, records, charts, lists, plans, magnetic tape recordings, telecopier messages, or copies of any of the foregoing now in the possession, care, custody (actual or constructive) of Duke, or of any of its agents or principals including, attorneys, employees or representatives.. If any document requested herein was, but no longer is, in your possession or control, state what disposition was made of it, when, and such document's location.

B. The term "communication" means and includes, but is not limited to, any transmission of words or thoughts between or among two or more persons including but not limited to spoken words or thoughts, discussions, conferences, conversations, negotiations, agreements, understandings, inquiries, promises, complaints, correspondence whether transmitted in person or by any electronic, telephonic or other means.

C. The term "person" means and includes, but is not limited to, natural persons, corporations, partnerships, associations, joint ventures, trusts, governments, and all other forms of legal entities, and the officers, directors, employees, agents, attorneys, partners and personal representatives thereof.

D. The term "relating to" means or refers to consisting of, constituting, containing, referring to, relating to, evidencing, reflecting or being in any way logically or factually connected with the matter discussed.

E. The term "proposed plant" means or refers to the William States Lee, III Nuclear Station referred to in the subject Application in this proceeding and associated

facilities.

DOCUMENTS TO BE PRODUCED

1. All documents which were relied upon or referred to in answering the interrogatories propounded herewith.
2. All documents which are intended to be offered in evidence in this proceeding as well as all drafts, notes or working papers related to evidence to be offered in this proceeding.
3. All documents related to the cost of the proposed plant and necessary land and support facilities.
4. All documents related to the costs of the anticipated pre-construction costs of the proposed plant, including , but not limited to those enumerated in the subject Application.
5. All documents related to the cost of the Westinghouse AP 1000 power reactor proposed to be constructed at the plant.
6. All documents related to the funding to be sought or obtained from the US Department of Energy or other federal source in connection with the combined construction and operating license application or other licensing activity with the US Nuclear Regulatory Commission for the proposed plant.
7. All documents related to loan guarantees or other the funding to be sought or obtained from the US Department of Energy or other federal source in connection with licensing and construction of the proposed plant.
8. All documents related to the estimated costs of the Westinghouse AP 1000 power reactor to be constructed by any other utility.
9. All documents related to the withdrawal from joint or shared ownership by Southern Company or other entities in the proposed plant.

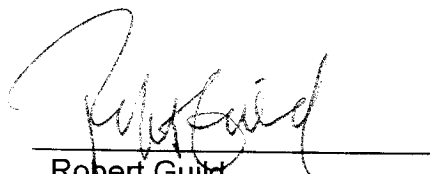
10. All documents related to plans for spent fuel storage and disposal or nuclear waste disposal or nuclear waste management related to the proposed plant.
11. All documents related to the costs and availability of other alternatives to the proposed plant considered by Duke for supplying its generation needs.
12. All documents related to the prudence of the decision to incur the preconstruction costs related to the proposed plant including the information known to Duke which is the basis for the decision to incur such costs.
13. All documents related to the projected or estimated cost of electricity, expressed in levelized cents per kwh, or otherwise, expected to be generated by the proposed plant over its lifetime.

INTERROGATORIES

1. Give the names and addresses of persons known to Duke or its counsel to be witnesses concerning the facts of the case and indicate whether or not any written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.
2. Set forth a list of photographs, plats, sketches or other prepared documents in possession of Duke or its counsel that relate to the claim or defense in the case.
3. List the names and address of any expert witness whom Duke proposes to use as a witness at the trial of the case.
4. For each person known to Duke to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the important facts known or observed by such witness, or provide a copy of any written or recorded statements taken from such witness.

5. Assuming the estimated costs of the Westinghouse AP1000 power reactor projected by others, including but not limited to Florida Power & Light, were applied to the proposed plant what would be the projected or estimated cost of electricity, expressed in levelized cents per kwh, or otherwise, expected to be generated by the proposed plant over its lifetime?

March 13, 2008


Robert Guild
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Columbia, SC 29201
(803) 252-1419

ATTORNEY FOR FRIENDS OF THE EARTH